

FILED  
Clerk  
District Court

OCT 17 2005

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

**CIVILLE & TANG**

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*Attorneys for Defendants  
Commonwealth of the Northern Mariana Islands and  
Office of the Attorney General*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

KAREN LINWOOD SEVERY,

Plaintiff,

vs.

COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS, OFFICE OF  
THE ATTORNEY GENERAL,  
DAVID W. HUTTON, individually and in his  
capacity as a supervisory employee of the  
Office of the Attorney General and the  
Commonwealth of the Northern Mariana  
Islands; and DOES 1-10, inclusive,

Defendants.

CIVIL ACTION NO. 05-0020

**DEFENDANTS CNMI AND OFFICE OF  
THE ATTORNEY GENERAL'S INITIAL  
DISCLOSURES PURSUANT TO FED. R.  
CIV. P. 26(a), 26(f) and LR 16.2CJ**

Defendants Commonwealth of the Northern Mariana Islands and Office of the Attorney

General ("CNMI defendants") submit the following pre-discovery disclosure statement in  
accordance with LR16.2CJ(d).

**Information Required to be Disclosed by Fed.R.Civ.P. 26(a):**

**DISCLOSURE NO. 1:**

The name, last known address and telephone number of each person likely to have

discoverable information that the CNMI defendants may use to support their claims or defenses, and the subject of such information.

**DISCLOSURE:**

The following individuals are believed to possess discoverable information relevant to the CNMI defendants' claims and defenses. In addition to the individuals identified herein, the CNMI defendants reserve the right to call as witnesses any individual identified by any other party as possessing discoverable information. The CNMI defendants further reserve the right to supplement this list as the case develops.

Name, Address and Telephone	Subject Matter
Pamela Brown, Esq. Office of the Attorney General 2nd Floor Administration Bldg Capitol Hill, Saipan, MP 96950 (670) 664-2341	All allegations against the Office of the Attorney General, policies and procedures of the Office of the Attorney General relevant to Ms. Severy's claims, Ms. Severy's performance while employed by the Office of the Attorney General; communications from Ms. Severy to the Attorney General or employees of the Office of the Attorney General, responses by Office of the Attorney General to communications from Ms. Severy, investigation by Office of the Attorney General into weapons related allegations by Ms. Severy against Mr. Hutton, response by Office of Attorney General to Ms. Severy's allegations that she was sexually harassed or otherwise the object of improper conduct by Mr. Hutton, travel requests by Ms. Severy.
Clyde Lemons, Esq. Office of the Attorney General 2nd Floor Administration Bldg Capitol Hill, Saipan, MP 96950 (670) 664-2341	Allegations against the Office of the Attorney General, policies and procedures of the Office of the Attorney General relevant to Ms. Severy's claims, Ms. Severy's performance while employed by the Office of the Attorney General; communications from Ms. Severy to the Attorney General or employees of the Office of the Attorney General, responses by Office of the Attorney General to communications from Ms. Severy, investigation by Office of the Attorney General into weapons related allegations by Ms. Severy against Mr. Hutton, response by Office of Attorney General to Ms. Severy's allegations that she was sexually harassed or otherwise the object of improper conduct by Mr. Hutton, travel requests by Ms. Severy.

Name, Address and Telephone	Subject Matter
Ed Buckingham, Esq. Office of the Attorney General 2nd Floor Administration Bldg Capitol Hill, Saipan, MP 96950 (670) 664-2341	Allegations against the Office of the Attorney General, policies and procedures of the Office of the Attorney General relevant to Ms. Severy's claims, Ms. Severy's performance while employed by the Office of the Attorney General; communications from Ms. Severy to the Attorney General or employees of the Office of the Attorney General, responses by Office of the Attorney General to communications from Ms. Severy, investigation by Office of the Attorney General into weapons related allegations by Ms. Severy against Mr. Hutton, response by Office of Attorney General to Ms. Severy's allegations that she was sexually harassed or otherwise the object of improper conduct by Mr. Hutton, travel requests by Ms. Severy.
David Hutton c/o Law Offices of Anthony G. Long	Allegations made against him by the plaintiff.
Frank Gibson CNMI EEO Coordinator	Investigations of allegations by Ms. Severy.
Juan I. Tenorio (or his designee) Director of Personnel Office of Personnel Management	Investigations of allegations by Ms. Severy.
Justin Wolosz	Issue of whether Mr. Hutton brandished a firearm as alleged by plaintiff, and other allegations by plaintiff against Mr. Hutton.
Karen Severy	Matters pertaining to her employment and the allegations she has made against the defendants

**DISCLOSURE NO. 2:**

A copy of or description by category and location of all documents, data compilations and tangible things that are in the possession, custody or control of the CNMI defendants and that the CNMI defendants may use to support their claims or defenses.

**DISCLOSURE:**

The following documents, except for the OPM investigative report, are in the possession of the Office of the Attorney General. Copies will be bates stamped and produced upon execution by the parties of an appropriate Protective Order. The CNMI defendants reserve the right to use at

1 trial, or in connection with any pre-trial matters, any documents identified or produced by any  
2 other party to this litigation. The CNMI defendants further reserve the right to supplement this list  
3 as the case develops.

- 4 1. Any and all documents in Ms. Severy's Personnel folder;
- 5 2. Ms. Severy's contract of employment;
- 6 3. OPM investigative report; relating to Ms. Severy's complaint by any person or  
7 entity;
- 8 4. Email communications between Ms. Severy and Ms. Brown or between Ms.  
9 Severy and attorneys within the Attorney General's Office;
- 10 5. Various memoranda between the Attorney General and Ms. Severy.

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13 **DISCLOSURE NO. 3:**

14 Identification of expert witnesses.

15 **DISCLOSURE:**

16 The CNMI defendants have not yet determined whether expert witnesses will be  
17 necessary, and have not retained any expert witnesses.

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19 **DISCLOSURE NO. 4:**

20 A computation of any category of damages claimed.

21 **DISCLOSURE:**

22 The CNMI defendants are not currently asserting a counterclaim or cross claim for  
23 damages.

1 **DISCLOSURE NO. 5:**

2 A copy for inspection and copying of any insurance agreement under which a person  
3 carrying on an insurance business may be liable to satisfy part or all of the judgment which may  
4 be entered in this case.

5 **DISCLOSURE:**

6 THE CNMI defendants are not aware of any insurance policy which would provide  
7 coverage for the damages claimed by the plaintiff.

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9 DATED: October 16, 2005.

10 **CIVILLE & TANG**

11  
12  
13 By: 

**G. PATRICK CIVILLE**

*Attorneys for Defendants*

*Commonwealth of the Northern Mariana*

*Islands and Office of the Attorney General*